



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

July 8, 2003

CERTIFIED MAIL # 7000 1670 0013 9129 0024

Mr. Eric St. Pierre, Operations Manager
Idaho Concrete Co.
2755 E. State St.
Eagle, ID 83616

RE: AIRS Facility No.'s 777-00151, 777-00113, 777-00106, Idaho Concrete Co., Eagle
Final Tier II Operating Permit and Permit to Construct Letter

Dear Mr. St. Pierre:

The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No.'s T2-020031, T2-020032, and T2-020033 to Idaho Concrete Co. for their facilities located in Eagle, in accordance with IDAPA 58.01.01.200-288 and 400-406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II operating permits and permits to construct are based on the information contained in your permit applications and on the relevant comments received during the public comment period. Modification to and/or renewal of these permits shall be requested in a timely manner in accordance with the *Rules*.

Thomas Krinke of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers, Regional Permit Program Coordinator, at (208) 373-0502 to address any questions or concerns you may have with the enclosed permits.

Sincerely,


C. Stephen Allred, Director
Department of Environmental Quality

CSA/REB/sd Permit No.'s T2-020031, T2-020032, and T2-020033

Enclosure



**Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: T2-020033

AIRS FACILITY NO.: 777-00151

SIC: 3273 **CLASS:** SM

UTM COORDINATE (km): PORTABLE

1. PERMITTEE

Idaho Concrete Co.

2. PROJECT

Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS

P.O. Box 789, 2755 E. State St.

CITY

Eagle

STATE

ID

ZIP

83616

4. FACILITY CONTACT

Eric St. Pierre

TITLE

Operations Manager

TELEPHONE

(208) 939-6831

5. RESPONSIBLE OFFICIAL

Eric St. Pierre

TITLE

Operations Manager

TELEPHONE

(208) 939-6831

6. EXACT PLANT LOCATION

Portable

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Production of ready-mix concrete

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470 and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 et seq.


C. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 8, 2003

DATE EXPIRES: July 8, 2008

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AIRS	Aerometric Information Retrieval System
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
O&M	Operations and Maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033

Permittee:	Idaho Concrete Co.	AIRS Facility No. 777-00151	Date Issued:	July 8, 2003
Location:	Portable		Date Expires:	July 8, 2008

1. PERMIT SCOPE***Purpose***

- 1.1 The purpose of this permit is to limit PM₁₀ emissions from this facility as part of the Northern Ada County PM₁₀ Maintenance Plan.
- 1.2 This Tier II operating permit and permit to construct incorporates the following permit:
- PTC No. 777-00151, issued August 3, 2000

Regulated Sources

- 1.3 Table 1.1 lists all sources of emissions that are regulated in this permit.

Table 1.1 EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Cement storage silo	Baghouse
4	All associated fugitive emissions from the following: sand and aggregate transfers, weigh hopper loading, truck mixing, vehicle traffic, and wind erosion of stockpiles	Reasonable control

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2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility:

Table 2.1 SUMMARY OF REQUIREMENTS

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
2.1	Fugitive dust	Reasonable control	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.5, 2.13
2.6	Odors	Reasonable control	IDAPA 58.01.01.775-776	2.7, 2.13
2.8	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.9, 2.13
2.10	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.13
2.12	Air stagnation advisory	Compliance with IDAPA 58.01.01.550-562	IDAPA 58.01.01.550-562	2.13
2.14	Open burning	In accordance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.13

Fugitive Dust

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

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- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a weekly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.
- 2.5 Visible emissions are a trigger that requires the initiation of a strategy or strategies to control fugitive dust emission from associated processes of a concrete batch plant such as weigh hopper, sand and aggregate transfer, truck mixing, paved and unpaved roads, and stockpiles. Emissions from any of the associated processes and roads shall not exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Odors

- 2.6 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.9 The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee

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shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

Reports and Certifications

- 2.11 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706

Air Stagnation Advisory Days

- 2.12 The permittee shall comply with the *Air Pollution Emergency Rules* in IDAPA 58.01.01.550-562.

Monitoring and Recordkeeping

- 2.13 The permittee shall maintain sufficient recordkeeping to ensure compliance with all the terms and conditions of this operating permit. Records of monitoring information shall include, but not limited to the following: (a) the date, place, and times of sampling or measurement; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurements. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

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Open Burning

- 2.14 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

Obligation to Comply

- 2.15 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Relocation

- 2.16 At least 10 days prior to relocating any equipment covered by this permit, the permittee shall register all existing portable equipment using the Department's Portable Equipment Registration and Relocation Form (PERF) available on the Department's Website at: www.state.id.us/deq/air/equiprelocat.htm. Each PERF, along with a scaled plot plan of the relocation site, shall be mailed to the following address:

PERF Processing Unit
Idaho DEQ - Air Quality
1410 N. Hilton
Boise, ID 83706-1255

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3. CEMENT STORAGE SILO**3.1 Process Description**

The purpose for the cement storage silo is to store cement for use in the production of concrete.

3.2 Control Description

Particulate matter emissions from the pneumatic loading of cement from a delivery truck to the cement storage silo are controlled by a baghouse.

Emissions Limits**3.3 Emissions Limits**

Emissions of PM₁₀ from cement silo loading shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

[PTC No. 777-00151, 8/3/00]

Operating Requirements**3.4 Throughput Limits**

The maximum annual production of concrete shall not exceed 500,000 cubic yards per any consecutive 12-month period.

3.5 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for the cement storage silo baghouse describing the procedures that shall be followed to comply with General Provision 5.2 and the baghouse pressure drop requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.

3.6 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a pressure drop monitoring device to measure the pressure differential across the cement storage silo baghouse.

3.7 Pressure Drop Across Air Pollution Control Device

The pressure drop across the cement storage silo baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of both manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

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Monitoring and Recordkeeping Requirements**3.8 Operating Parameters**

The permittee shall monitor and record the following information:

- Pressure drop reading across the cement storage silo baghouse once each time the cement storage silo is loaded.
- Concrete production in cubic yards per month and cubic yards per year. Monthly concrete production shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 3.4.

These records shall be maintained in accordance with Permit Condition 2.13.

[PTC No. 777-00151, 8/3/00]

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4. APPENDIX**Table 4.1 EMISSION LIMITS**

Idaho Concrete Co. Emission Limits^a - Hourly (lb/hr), and Annual^b (T/yr)		
Source Description	Hourly PM₁₀^c Emissions (lb/hr)	Annual PM₁₀^c Emissions (T/yr)
Cement storage silo	3.7	0.6
All associated process emissions (fugitives included)		19.4

^a As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensibles.

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5. GENERAL PROVISIONS

- 5.1 All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101 et seq.
- 5.2 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 5.3 The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
- 5.4 Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 5.5 Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 5.6 In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
- 5.7 This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
- 5.8 The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 5.9 The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.